

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Commission's Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Annual 64.2009(e) CPNI Certification for 2007.

Date filed: 2-28-08
Name of company covered by this certification: Grafton Long Distance
Form 499 Filer ID: 801364
Name of signatory: Carolyn Susan Arnold
Title of signatory: Corporate Secretary

I, Carolyn Susan Arnold, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

/s/ Carolyn Susan Arnold
Corporate Secretary

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cc: (2) Federal Communications Commission, Enforcement Bureau; (1) Best Copy and Printing, Inc.

Certification Statement

February 28, 2008

Grafton Long Distance CPNI Operating Procedures

Grafton Long Distance has provided training to existing employees and will provide training to all new employees on the proper use and disclosure of (CPNI). Records of the training material and documentation of the attendance is kept on file. Any employee's noncompliance with CPNI policies will be reported and appropriate disciplinary steps taken.

CPNI notification letters were sent to all customers explaining what CPNI is and asking customer to call office to set up a password and challenge question. When customer calls, no CPNI information is released without a password. When a customer comes in-store, a valid photo ID is required before releasing CPNI information. Grafton Long Distance billing company is also compliant with the CPNI regulations.

In the past year, no action taken against data brokers and no customer complaints received concerning unauthorized release of CPNI.